REMARKS

Status of Claims

At the time the Office Action was mailed, claims 1-24 were pending in the

application. In the present response, claims 1-24 have been amended to correct matters of

form. No claims have been added or canceled. No new matter has been added. Therefore,

claims 1-24 remain pending in the application. Applicants respectfully request

reconsideration of the present application.

Amendments to the Specification

Applicants have amended the specification to correct obvious typographical errors

and to correct grammatical and usage errors. No new matter has been added.

Claim Rejections - 35 U.S.C. § 112

The Examiner has rejected claims 2-8 and claims 10-16 under 35 USC 112, second

paragraph, as being indefinite for failing to particularly point out and distinctly claim the

subject matter which applicant regards as the invention. The applicants have amended claims

2 and 10 to replace the limitation "the stored identification information" with the limitation

"the first identification information," and have provided sufficient antecedent basis for the

subject limitation by amending claims 1 and 9.

Claim Rejections - 35 U.S.C. § 102

The Examiner has rejected claims 1-24 under 35 USC 102(b) as being anticipated by

Dustan et al. (U.S. Patent No. 5,884,312, hereinafter "Dustan"). Applicants submit that

-19-

claims 1-24, as amended, are not anticipated by Dustan because Dustan does not teach each and every limitation of claims 1-24, as amended.

Claims 1-8 and 9-16

As to independent claims 1 and 9, the applicants respectfully disagree with the Examiner's rejections because Dustan does not disclose "comparing the second identification information with the first identification information to generate an authentication result," as recited in independent claims 1 and 9, as amended (emphasis added). As cited by the Examiner, Dustan discloses:

> a web server program [that] allows web browser-enabled clients of the Internet or web browser-enabled clients of a corporate intranet to receive graphical documents that are either stored at web browser 28 and identified by a specific URL or generated using a particular script at web browser 28 also identified by a specific URL.
> (Dustan, col. 8, lines 16-21 and figure 2)

That is, Dustan discloses receiving a graphical document that is identified by a URL, or generating a graphical document from a script that is identified by a URL. Dustan does not disclose comparing anything, either the URLs or the graphical documents. Therefore, because Dustan does not disclose comparing as recited in independent claims 1 and 9, he cannot and does not disclose that an authentication result of the comparison is generated as recited in independent claims 1 and 9. Accordingly, applicants respectfully submit that independent claims 1 and 9 are not anticipated by Dustan. Given that claims 2-8 depend from claim 1 and that claims 10-16 depend from claim 9, applicants submit that claims 2-8, as amended, and claims 10-16, as amended, are also not anticipated by Dustan.

Claims 17-24

As to independent claim 17, the applicants respectfully disagree with the Examiner's rejection because Dustan does not disclose "a tamper-resistant storage location to maintain a first identification information of the organization property and network addresses of the organization servers" as recited in independent claim 17, as amended (emphasis added). The Examiner cites the following passages from Dustan, which the Examiner characterizes as "a

database management system in conjunction with storage in the database server to initiate

procedures to access documents." (7/1/2004 Office Action, page 6, lines 6-7).

> Database server 22 includes a processor 74, I/O devices 76, memory 78, and various mass storage devices or tables such as mass storage device 80, activity log table 82, and user table 84. Memory 78 will generally be provided as RAM and will be enabled with operating system 86, which will preferably be provided as the UNIX operating system, and a database management system 88, which will preferably be provided as SYBASE relational database management system. In such a system, database management system 88 may receive instructions or commands from scripts located at web server 28 to initiate various stored procedures or computer programs located within database server 22. For example, a logon stored procedure 90 is shown being executed by database management system 88. Logon script 70 of web server 28 may initiate the execution of logon stored procedure 90.
> (Dustan, col. 12, lines 49-67).

> Mass storage device 80 is provided to store a variety of computer files and programs such as various stored procedures, an encryption routine, and various registered procedures. Once again, stored procedures may be defined as programs that allow a directly compatible data source, such as a SYBASE compatible database or application, to perform functions as desired. A registered procedure will generally be called by a stored procedure and is used to pass parameters and values to a database or application that is not directly compatible with database management system 88. Registered procedures may be written in C code, and along with the stored procedures, allow for portability and ease of upgradeability when designing new systems.
> (Dustan, col. 13, lines 1-10).

Applicants respectfully submit that nowhere in the citation is a "tamper-resistant

storage location" disclosed, as recited in independent claim 17. On the contrary, and as the

Examiner's own characterization confirms, Dustan merely discloses a database management

system with procedures to access documents. Accordingly, applicants respectfully submit

that independent claim 17, as amended, is not anticipated by Dustan. Given that claims 18-

24 depend from claim 17, applicants submit that claim 18-24 are also not anticipated by
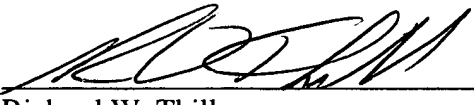
Dustan.

Conclusion

In view of the foregoing amendments and arguments, applicants submit that all objections and rejections have been traversed and that the application is in condition for allowance. Applicants respectfully request that a timely notice of allowance be issued in this case.

If there are any additional charges, please charge Deposit Account No. 02-2666.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

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Richard W. Thill
Reg. No. 53,686

12400 Wilshire Boulevard
Seventh Floor
Los Angeles, CA 90025-1026
(408) 720-8300